GIBSON, DUNN & CRUTCHER LLP Sec. 203 Exclusion Request for Nippon Steel Corporation, November 13, 2001 Exclusion Request No. 8

EXCLUSION REQUEST NO. 8

a. Product Name: Hot-Rolled High Flange-Formability Steel

HTSUS Classification: 7208.39.0015

b. Technical Description:

Hot-Rolled High Flange-Formability Steel is a type of hot-rolled steel that is used in the production of automotive parts (*i.e.*, suspension links and suspension members) on account of its excellent punching quality. NSC seeks product exclusions for varieties of this product meeting the following product characteristics:

chemical composition: Variety 1 carbon content up to 0.25%, by weight; silicon content up to 1.00%, by weight; manganese content up to 2.00%, by weight phosphorus content up to 0.050%, by weight sulfur content up to 0.020%, by weight titanium content up to 0.10%, by weight physical & mechanical properties: thickness range of 1.400 to 6.000 mm (inclusive); minimum tensile strength (MPA) of 440(N/mm²); if 1.2 mm to 1.59 mm thickness range; yield point (MPA): 295<410(N/mm²); elongation: 28<41(%) if 1.6 mm to 1.99 mm thickness range; yield point (MPA): 285<400(N/mm²); elongation: 29<42(%) if 2.0 mm to 2.49 mm thickness range; yield point (MPA): 275<390(N/mm²); elongation: 30<43(%) if 2.5 mm to 3.19 mm thickness range; yield point (MPA): 275<390(N/mm²); elongation: 32<45(%) if 3.2 mm to 3.99 mm thickness range; yield point (MPA): $265 \le 380 (N/mm^2)$; elongation: 33<46(%) if 4.0 mm to 6.0 mm thickness range; yield point (MPA): 265<380(N/mm²); elongation: 34<47(%) Burring Test: 100% Min.

GIBSON, DUNN & CRUTCHER LLP Sec. 203 Exclusion Request for Nippon Steel Corporation, November 13, 2001 Exclusion Request No. 8

Variety 2	chemical composition:					
	carbon content up to 0.25%, by weight;					
	silicon content up to 1.00%, by weight;					
	manganese content up to 2.00%, by weight					
	phosphorus content up to 0.050%, by weight					
	sulfur content up to 0.020%, by weight					
	titanium content up to 0.10%, by weight					
	physical & mechanical properties:					
	thickness range of 1.600 to 6.000 mm (inclusive);					
	minimum tensile strength (MPA) of 540(N/mm ²);					
	if 1.6 mm to 1.99 mm thickness range;					
	yield point (MPA): 375\(\frac{510(N/mm^2)}{};					
	elongation: 22 <u><</u> 36(%)					
	if 2.0 mm to 2.49 mm thickness range;					
	yield point (MPA) :365 < 500(N/mm²);					
	elongation: 23 \(\leq 37(\%) \)					
	if 2.5 mm to 3.19 mm thickness range;					
	yield point (MPA) : 365 <u><</u> 500(N/mm ²);					
	elongation: 23<37(%)					
	if 3.2 mm to 3.99 mm thickness range;					
	yield point (MPA): 355 <u><</u> 490(N/mm ²);					
	elongation: 24\le 38(\%)					
	if 4.0 mm to 6.0 mm thickness range;					
	yield point (MPA): 355 <u></u> 490(N/mm ²);					
	elongation: 24 <u><</u> 38(%)					
	Burring Test: 80% Min.					
Variety 3	chemical composition:					
	carbon content up to 0.20%, by weight;					
	silicon content up to 1.20%, by weight;					
	manganese content up to 2.30%, by weight					
	phosphorus content up to 0.050%, by weight					
	sulfur content up to 0.020%, by weight					
	titanium content up to 0.20%, by weight					
	physical & mechanical properties:					
	thickness range of 1.600 to 6.000 mm (inclusive);					
	minimum tensile strength (MPA) of 590(N/mm²);					
	if 1.6 mm to 1.99 mm thickness range;					
	yield point (MPA) :460≤610(N/mm²);					
	elongation: 17≤31(%)					
	if 2.0 mm to 2.49 mm thickness range;					
	yield point (MPA) :450 <u><</u> 600(N/mm ²);					
	elongation: 18≤32(%)					
	if 2.5 mm to 3.19 mm thickness range;					
	yield point (MPA) : 450≤600(N/mm²);					
	elongation: 18≤32(%)					

Sec. 203 Exclusion Request for Nippon Steel Corporation, November 13, 2001

Exclusion Request No. 8

if 3.2 mm to 3.99 mm thickness range; yield point (MPA): 440 \(\leq 590 \)(N/mm²); elongation: 19 \(\leq 33 \)(%) if 4.0 mm to 6.0 mm thickness range; yield point (MPA): 440 \(\leq 590 \)(N/mm²); elongation: 19 \(\leq 33 \)(%) Burring Test: 75% Min.

c. <u>Basis for Exclusion Request:</u>

The above noted varieties of Hot-Rolled High Flange-Formability Steel should be excluded from any Section 203 restrictions because Hot-Rolled High Flange-Formability Steel cannot be produced in the United States. Indeed, NSC has applied for a patent on this product, which has excellent press formability. *See* International Application No. PCT/JP00/08934: "High Fatigue Strength Steel Sheet Excellent in Burring Workability and Method for Producing the Same." NSC is not aware of any substitute products that are commercially produced in the United States.

d. Names and Locations of Any Producers:

NSC is the only producer of this product.

e. <u>Total U.S. Consumption</u>:

1

NSC has estimated [

	2001	2002	2003	2004	2005
Qty (ST)					
Value US \$					

GIBSON, DUNN & CRUTCHER LLP Sec. 203 Exclusion Request for Nippon Steel Corporation, November 13, 2001 Exclusion Request No. 8

f. Total U.S. Production:

As noted above, there is no U.S. production of this product.

g. <u>U.S.-Produced Substitute, Total U.S. Production of Substitute, and the Names</u> of Any U.S. Producers of the Substitute:

NSC is unaware of any U.S.-manufactured steel products that are commercially-viable substitutes for Hot-Rolled High Flange-Formability Steel.

Public Exclusion Request No. 8~Hot-Rolled Flange-Formability Steel.doc

4